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Attorney for Jeri Coppa-Knudson, Trustee

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

IN RE:	CASE NO. BK-N-14-50333-BTB
ANTHONY THOMAS and	CASE NO. BK-N-14-50331-BTB
WENDI THOMAS,	(Jointly Administered)
AT EMERALD, LLC,	CHAPTER 7
Debtors.	

**DECLARATION OF JEFFREY
HARTMAN IN SUPPORT OF REPLY TO
DEBTORS' OPPOSITION TO MOTION
FOR TURNOVER OF REAL PROPERTY
AND ORDER REQUIRING AN
ACCOUNTING**

**Hearing Date: September 13, 2018
Hearing Time: 1:30 p.m.
(Rescheduled per Court)**

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Jeffrey L. Hartman, under penalty of perjury of the laws of the United States,
declares:

1. I am counsel to Jeri Coppa-Knudson, the duly appointed and acting trustee
("Trustee"), in these jointly administered chapter 7 cases. I make this Declaration in support
of the Trustee's Reply To Debtors' Opposition To Motion For Turnover, **DE 398**, and to
correct an error in the Turnover Motion. **DE 353**.

2. These cases were initially filed as chapter 11 petitions on March 4, 2014
("Petition Date"). The chapter 11 cases were converted to chapter 7 on August 29, 2014 and
the Trustee was appointed to administer the estates.

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1 3. I believe that Anthony and Wendi Thomas (“Debtors”), are currently residing at
2 7725 Peavine Peak Court, Reno, Nevada.

3 4. On the Petition Date, the Thomases filed their Schedules of Assets and Liabilities
4 and Statement of Financial Affairs and identified their residence as 7725 Peavine Peak
5 Court in Reno, Nevada.

6 5. As of the Petition Date, the Thomases’ Schedule A indicated that they owned no
7 real property.

8 6. In response to Question 10 of the Statement of Financial Affairs, under penalty of
9 perjury, the Thomases stated that in 2008 they had transferred a residence in Portola,
10 California (the “Property”), to Debtor Anthony Thomas’ parents for \$200,000.

11 7. Debtor Anthony Thomas’ mother is listed on Schedule F as an unsecured creditor
12 for \$200,000.

13 8. The Thomases took title to the Property by Grant Deed recorded in Plumas
14 County on or about September 11, 2000 as document no. 2000-06518, a copy of which
15 vesting deed is attached to **DE 354 as Exhibit A**. The Property is more specifically
16 identified as 397 Second Avenue, Portola, California, APN 126-123-001. A copy of a
17 current Condition of Title Guarantee on the Property, prepared by Cal-Sierra Title on July 3,
18 2018, is attached to **DE 354 as Exhibit B**.

19 9. I was employed to represent the Trustee on October 31, 2014. **DE 219**. The
20 § 341(a) meeting of creditors was held on December 4, 2014. I did not attend the meeting of
21 creditors. My initial activities on behalf of the Trustee involved reviewing pending
22 litigation including the Kenmark Ventures litigation, **DE 241**, and issues related to the large
23 emerald being stored in Florida.

24 10. I prepared and filed the Motion For Turnover (“Motion”), **DE 353**, based on the
25 papers filed in the docket. It was not until August 22, 2018 that I listened to the recorded
26 transcript of the December 2014 meeting of creditors.

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1 11. I was in error in stating in the Motion that the Debtors had concealed the Portola
2 Property from the Trustee. The Portola property was discussed at the December 4, 2014
3 meeting of creditors and the Thomases testified that they had transferred the property to his
4 parents in 2008 but that his parents had never recorded the deed.

5 Dated: September 11, 2018.

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7 /S/ Jeffrey L. Hartman
8 Jeffrey L. Hartman
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CERTIFICATE OF SERVICE

I certify that I am an employee of Hartman & Hartman, and that on September 11, 2018, I caused to be served the foregoing document as indicated below:

✓ a. ECF System, to

JEFFREY A. COGAN
jeffrey@jeffreycogan.com, beautausinga@gmail.com;beau@jeffreycogan.com

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U.S. TRUSTEE - RN - 7, 7
USTPRegion17.RE.ECF@usdoj.gov

JOSEPH G. WENT
JGWent@hollandhart.com, vllarsen@hollandhart.com

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1 ✓ b. U. S. Mail, postage prepaid, September 11, 2018, addressed to:

2 ANTHONY THOMAS
3 WENDI THOMAS
4 AT EMERALD, LLC
7725 Peavine Peak Court
Reno, NV 89523-4914

5 ✓ c. Electronically, September 11, 2018, via email to Debtors, per letter request
6 dated February 1, 2016, addressed to:

7 ATEmerald2@gmail.com

8 I declare under penalty of perjury that the foregoing is true and correct.

9 DATED: September 11, 2018.

10 /S/ Stephanie Ittner
11 STEPHANIE ITTNER
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